



FAIR POLITICAL PRACTICES COMMISSION

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March 8, 2010

Lance Olson

Olson Hagel & Fishburn LLP

✓ o/b/o/ William Zane Foy and Jennifer Foy

REDACTED

RE: Advisory Letter

FPPC Case No. 05/166; The People for Larry Russell, Ph.D.

Dear Mr. Olson:

The Fair Political Practices Commission ("Commission") enforces the provisions of the Political Reform Act (the "Act")¹. As you may be aware, the Commission has been investigating the activities of The People for Larry Russell, Ph.D. Committee ("Committee") in response to a complaint received by the Commission. During our investigation, we discovered that Mr. and Mrs. Foy may have inadvertently made a campaign contribution to the Committee by making a payment to another individual, Frank Torrez Gonzalez, at the behest of a candidate, Larry Russell, Ph.D., in order to repay a loan provided to Mr. and Mrs. Foy by Mr. Russell. Under the Act, all contributions received and expenditures made must be reported on the appropriate campaign statement (Section 84211) and all contributions, including payments made at the behest of a candidate for a political purpose, must be reported in the name of the person making the contribution. (Sections 82015 and 84301.) For the future, please be aware that when paying a third party at the request of a candidate, even if in response to a personal request of a friend or in repayment of a loan, there may be a political purpose involved which makes your payment a contribution under the Act.

The Commission publishes forms and manuals to facilitate compliance with the provisions of the Act. If you need forms or manuals, or guidance regarding your obligations, please call the Commission's Technical Assistance Division at 1-866-275-3772. Please also visit our website at www.fppe.ca.gov.

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

If you have any questions regarding this matter, please feel free to contact me at 916-322-5660.

Sincerely,

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/ Galena West
Senior Commission Counsel
Enforcement Division